UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JAMES SHROFF, Derivatively on Behalf of JPMORGAN CHASE & CO.,

Plaintiff,

vs.

JAMES DIMON, INA R. DREW, JAY MANDELBAUM, CHARLES W. SCHARF, HEIDI MILLER, STEVEN D. BLACK, SAMUEL TODD MACLIN, JAMES E. STALEY, MICHAEL J. CAVANAGH, WILLIAM T. WINTERS, JOHN F. BRADLEY, FRANK BISIGNANO, LOUIS RAUCHENBERGER, LEE R. RAYMOND, JAMES S. CROWN, WILLIAM H. GRAY, III, LABAN P. JACKSON, JR., ELLEN V. FUTTER, DAVID C. NOVAK, STEPHEN B. BURKE, ROBERT I. LIPP, WILLIAM C. WELDON, CRANDALL C. BOWLES, DAVID M. COTE, WILLIAM B. HARRISON, JR., WILLIAM H. MCDAVID, JOSEPH L. SCLAFANI, DON M. WILSON, III, AUSTIN A. ADAMS, RICHARD J. SREDNICKI, RICHARD A. MANOOGIAN, JOHN A. KESSLER and JOHN H. BIGGS,

Defendants,

-and-

JPMORGAN CHASE & CO., a Delaware corporation,

Nominal Defendant.

Civil Action No. 08-CV-00974-DLC

MOTION TO ADMIT DANIEL R. FORDE PRO HAC VICE

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Leigh Lasky a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Telephone: (619) 525-3990 Facsimile: (619) 525-3991

Daniel R. Forde is a member in good standing of the Bar of the State of California (#248461).

DATED: May 7, 2008

New York, NY

Respectfully submitted,

LASKY & RIFKIND, LTD.

LEIGH LASKY

LEIGH LASKY

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1/40 Broadway, 23rd Floor

New York, New York 10005

Telephone: (212) 907-0800

Facsimile: (212) 684-6083

ROBBINS UMEDA & FINK, LLP

JEFFREY P. FINK

GEORGE C. AGUILAR

DANIEL R. FORDE

610 West Ash Street, Suite 1800

San Diego, CA 92101

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Facsimile: (619) 525-3991

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JAMES SHROFF, Derivatively on Behalf of JPMORGAN CHASE & CO.,	: Civil Action No. 08-CV-00974-DLC
Plaintiff,	: :
vs.	: : :
JAMES DIMON, INA R. DREW, JAY MANDELBAUM, CHARLES W. SCHARF, HEIDI MILLER, STEVEN D. BLACK, SAMUEL TODD MACLIN, JAMES E. STALEY, MICHAEL J. CAVANAGH, WILLIAM T. WINTERS, JOHN F. BRADLEY, FRANK BISIGNANO, LOUIS RAUCHENBERGER, LEE R. RAYMOND, JAMES S. CROWN, WILLIAM H. GRAY, III, LABAN P. JACKSON, JR., ELLEN V. FUTTER, DAVID C. NOVAK, STEPHEN B. BURKE, ROBERT I. LIPP, WILLIAM C. WELDON, CRANDALL C. BOWLES, DAVID M. COTE, WILLIAM B. HARRISON, JR., WILLIAM H. MCDAVID, JOSEPH L. SCLAFANI, DON M. WILSON, III, AUSTIN A. ADAMS, RICHARD J. SREDNICKI, RICHARD A. MANOOGIAN, JOHN A. KESSLER and JOHN H. BIGGS,	
Defendants,	: :
-and-	: :
JPMORGAN CHASE & CO., a Delaware corporation,	: :
Nominal Defendant.	: :
	-X

AFFIDAVIT OF LEIGH LASKY IN SUPPORT OF MOTION TO ADMIT DANIEL R. FORDE *PRO HAC VICE*

State of New York)	
)	ss:
County of New York)	

Leigh Lasky, being duly sworn, hereby deposes and says as follows:

- 1. I am an attorney with Lasky & Rifkind, Ltd., counsel for Plaintiff James Shroff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Daniel R. Forde as counsel *pro hac vice* to represent plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in September 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. Daniel R. Forde is an associate with Robbins Umeda & Fink, LLP, in San Diego, California.
- 4. I have found Mr. Forde to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 5. Daniel R. Forde is a member of good standing of the bar of the State of California, as evidenced by the annexed certificate enclosed as Exhibit A.
 - 6. Accordingly, I am please to move for the admission of Daniel R. Forde, pro hac vice.

EIGHLASKY

7. I respectfully submit a proposed order granting the admission of Daniel R. Forde, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Daniel R. Forde, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

DATED: May 7, 2008

New York, NY

SUBSCRIBED TO AND SWORN TO before

me this 7th day of May 2008.

Notary Public

My Commission expires:

Copul 10, 2011

OFFICIAL SEAL
AMELIA S. NEWTON
Notary Public - State of Illinois
My Commission Expires Apr 10, 2011

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EXHIBIT A

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

April 25, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DANIEL ROBERT FORDE, #248461 was admitted to the practice of law in this state by the Supreme Court of California on February 23, 2007; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California, and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Custodian of Membership Records

EXHIBIT B

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JAMES SHROFF, Derivatively on Behalf of JPMORGAN CHASE & CO..

Civil Action No. 08-CV-00974-DLC

Plaintiff,

VS.

JAMES DIMON, INA R. DREW, JAY MANDELBAUM, CHARLES W. SCHARF, HEIDI MILLER, STEVEN D. BLACK, SAMUEL TODD MACLIN, JAMES E. STALEY, MICHAEL J. CAVANAGH, WILLIAM T. WINTERS, JOHN F. BRADLEY, FRANK BISIGNANO, LOUIS RAUCHENBERGER, LEE R. RAYMOND, JAMES S. CROWN, WILLIAM H. GRAY, III, LABAN P. JACKSON, JR., ELLEN V. FUTTER, DAVID C. NOVAK, STEPHEN B. BURKE, ROBERT I. LIPP, WILLIAM C. WELDON, CRANDALL C. BOWLES, DAVID M. COTE, WILLIAM B. HARRISON, JR., WILLIAM H. MCDAVID, JOSEPH L. SCLAFANI, DON M. WILSON, III, AUSTIN A. ADAMS, RICHARD J. SREDNICKI, RICHARD A. MANOOGIAN, JOHN A. KESSLER and JOHN H. BIGGS,

Defendants,

-and-

JPMORGAN CHASE & CO., a Delaware corporation,

Nominal Defendant.

[PROPOSED] ORDER FOR ADMISSION PRO HAC VICE OF DANIEL R. FORDE ON WRITTEN MOTION

Upon the motion of Leigh Lasky, attorney for Plaintiff Robert Shroff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Daniel R. Forde Robbins Umeda & Fink, LLP 610 West Ash Street, Suite 1800 San Diego, CA 92101 Telephone: (619) 525-3990

Facsimile: (619) 525-3991 Email address: brobbins@ruflaw.com

Is admitted to practice *pro hac vice* as counsel for Plaintiff Robert Shroff in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including Rules governing discipline of attorneys. As this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: May ____, 2008
New York, NY
HONORABLE DENISE COTE

HONORABLE DENISE COTE United States District Court Judge

CERTIFICATE OF SERVICE

This is to certify that I have thisth day of May, 2008 served counsel for the following
parties in this matter with a copy of the foregoing instrument by depositing a copy of the same in the
United States Mail, postage prepaid, as follows:
SULLIVAN & CROMWELL, LLP SHARON L. NELLES 125 Broad Street New York, New York 10004-2498
Counsel for Individual Defendants and nominal defendant JP Morgan
Leigh Lasky, Esq.

CERTIFICATE OF SERVICE

This is to certify that I have this 7th day of May, 2008 served counsel for the following parties in this matter with a copy of the foregoing instrument by depositing a copy of the same in the United States Mail, postage prepaid, as follows:

SULLIVAN & CROMWELL, LLP SHARON L. NELLES 125 Broad Street New York, New York 10004-2498

Counsel for Individual Defendants and nominal defendant JP Morgan

Leigh Lasky, Esq